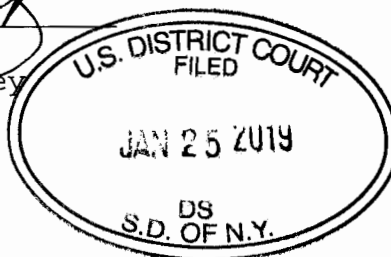


19 MAG 922

Approved: \_\_\_\_\_

LOUIS A. PELLEGRINO  
Assistant United States Attorney

Before: HONORABLE ROBERT W. LEHRBURGER  
United States Magistrate Judge  
Southern District of New York



- - - - - X  
UNITED STATES OF AMERICA : SEALED COMPLAINT  
:   
: Violation of  
- v. - : 21 U.S.C. § 846  
:   
RAMONA PETROVA, a/k/a : COUNTY OF OFFENSE:  
"JD Kat", : NEW YORK  
:   
Defendants. :   
:   
- - - - - X

SOUTHERN DISTRICT OF NEW YORK, ss.:

ANTHONY MANGANO, being duly sworn, deposes and says that he is a Detective with the New York City Police Department ("NYPD"), and charges as follows:

COUNT ONE

1. From at least in or about August 15, 2018 to the present, in the Southern District of New York and elsewhere, RAMONA PETROVA, a/k/a "JD Kat," the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that RAMONA PETROVA, a/k/a "JD Kat," the defendant, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance that RAMONA PETROVA, a/k/a "JD Kat," the defendant, conspired to distribute and possess with intent to distribute was 500 grams and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(B).

(Title 21, United States Code, Section 846.)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

4. I am a Detective with the NYPD, and I have been personally involved in the investigation of this matter. This affidavit is based upon my personal participation in the investigation, my conversations with law enforcement agents, witnesses, and others, as well as my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated. Where figures, calculations, and dates are set forth herein, they are approximate, unless stated otherwise.

5. Based on my participation in this investigation, my conversations with other NYPD officers, including an NYPD undercover officer ("UC-1"), and my review of NYPD and New York City Office of the Medical Examiner ("OME") reports, I have learned the following, in substance and in part:

a. On or about August 15, 2018, I was called to the scene of a potential female overdose victim ("Victim-1") at an apartment at 118 West 27th Street in Manhattan (the "Apartment"). From other officers, I learned that the NYPD had received a call indicating that Victim-1's roommate had observed Victim-1 sleeping on a mattress in Victim-1's Apartment at the time that the roommate exited the premises. When the roommate returned, the roommate saw that Victim-1 had not changed her position on the mattress. Thereafter, the roommate discovered that Victim-1 was deceased.

b. Inside the Apartment, I observed indications of drug use. For example, I and other detectives located suboxone, prescription pills, and empty zip lock bags with a powdery residue in them.

c. On or about August 16, 2018, OME determined that the cause of Victim-1's death was acute intoxication by the combined effects of cocaine, methamphetamine, and diazepam.

d. The NYPD seized Victim-1's cellphone and unlocked it. Upon review of the cellphone, I observed numerous text messages in which Victim-1 texted a particular phone number (the "Call Number") of a person who appeared to be a drug dealer, because the text messages discussed drug transactions. For example, in one text, dated August 9, 2018, the suspected dealer (who I later learned to be RAMONA PETROVA, a/k/a "JD Kat," the defendant) wrote: "Also got in w. Let md know how much you want so I can put it aside for you because none of this stuff lasts." From my training and experience, I believe that "w" is a reference to "white," which I know to be a code word for cocaine. Later that day, PETROVA again wrote Victim-1: "If I don't hear back from you within the next few hours its all gonna be gone and I don't want to hear it later. I can't hold onto this stuff as I have a ton of people waiting and I cant afford to lose any clients. Trying to help u out here as promised so if you're good then great if not let me know what u need."

e. Acting on this information, I arranged for UC-1 to dial the Call Number that was texting Victim-1. UC-1 called the number, and a person who I later determined to be PETROVA answered. UC-1 said to PETROVA in substance and in part that UC-1 was Victim-1's friend and wanted to buy drugs.

6. Based on my participation in this investigation, my conversations with other NYPD officers, including UC-1, and my review of NYPD reports, I have learned the following, in substance and in part:

a. UC-1 and RAMONA PETROVA, a/k/a "JD Kat," the defendant, began speaking and texting each other regularly to discuss drugs. On or about August 24, 2018, UC-1 met PETROVA in person, and purchased approximately 3 grams of cocaine from PETROVA in Manhattan. I and other NYPD officers were able to surveil this meeting, and we identified PETROVA from, among other things, her Call Number, and from the vehicle she was driving. For example, by tracing the license plate of the vehicle PETROVA was driving, I determined that the vehicle was registered in her name. Then, using Department of Motor Vehicle photographs, I assembled a photo array containing six photographs, and UC-1 selected PETROVA's photo from the photo array.

b. After their first meeting, UC-1 and PETROVA began talking frequently via text message to discuss drugs, and UC-1 began to conduct regular undercover drug buys from PETROVA.

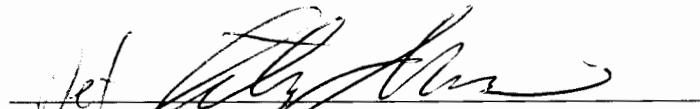
c. For example, on or about September 19, 2018, PETROVA texted UC-1: "To be honest you remind me a lot of myself when I first started up my biz Im very flexible price wise so again Im willing to work with you I see a lot of very good potential particularly as a woman in this biz!" In addition, PETROVA discussed her sources of supply with UC-1. For example, on or about September 28, 2018, PETROVA referred to "the source she has for bigger orders," and said that she picks up the coke "from either Harlem or the Bronx." She also referred to the order that UC-1 had placed on that day as from "her Harlem guy."

d. In total, between August 24, 2018 and the present, UC-1 conducted at least 13 cocaine buys from PETROVA within the Southern District of New York, purchasing over 500 grams of cocaine from her. Each of the 13 drug buys tested positive for the presence of cocaine.

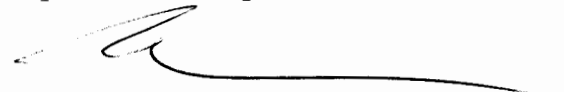
e. In addition, on or about November 20, 2018, PETROVA brought UC-1 to an apartment in Manhattan for what she called a "pill demo." The pill demo consisted of showing UC-1 a variety of different prescription pills that PETROVA was willing to sell to UC-1. In addition to the cocaine buys already discussed, UC-1 purchased from PETROVA several different variety of pills at the pill demo. The pills purchased by UC-1 tested positive for the presence of various controlled substances.

f. On the evening of January 24, 2019, PETROVA was arrested in the lower East Side of Manhattan with more than 100 grams of cocaine, after again agreeing to meet with UC-1 to arrange a cocaine sale.

WHEREFORE, I respectfully request that RAMONA PETROVA,  
a/k/a "JD Kat," the defendant, be imprisoned or bailed, as the  
case may be.

  
\_\_\_\_\_  
ANTHONY MANGANO  
Detective  
New York City Police Department

Sworn to before me this  
25th day of January, 2019

  
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THE HONORABLE ROBERT W. LEHRBURGER  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK